

United States District Court
for the ~~FILE~~
District of Massachusetts

Samuel Correa, et al.
Plaintiffs.

Civil Action
No. 05, 11230, JLT

✓
Kathleen Dennehy, et al.
Defendants

Declaration of Samuel Correa
In Support of Plaintiffs motion
for T.R.O. and Preliminary Injunction

I Samuel Correa. Hereby Declare, That:

1. The Defendants, on or about 11/26/04 confiscated all pens (regular) from Ten black and D.D.U. Prisoners. Due to an Isolated Incident un-related to any of the named Plaintiffs and re-issued all Segregation Prisoners with "Rubber Pens" calling them "Security Pens."

2. The new "Rubber Pens" are completely inadequate, and are only good to sign one's name. It is very difficult to write with and Incapable of Drafting Extensive "Legible Pleadings."
3. In order for me to Draft this Declaration, I had to seriously alter the Pen to get it to write somewhat Effectively.
4. And the defendant's cannot Plead "Security" Because these "Rubber Pens" can be used effectively as a weapon just like a "Proper Pen"
5. When I first entered D.D.U. the superintendent had a Policy that all attorney phone calls must be earned. This is still the Policy.
6. I was not allowed to call my Attorney unless I have a phone slip (which is earned.)
7. I was also not allowed to call my attorney on certain days.
8. I was only allowed to call my attorney on days in which my "Earned" phone calls are scheduled.

9. It is impossible for me to contact my attorney in the Am hours, which is the only time to contact her.

10. In order to make an attorney call I'm required to write to the superintendent's office and request permission to make such call, which takes at least (1) week to receive a reply (if at all) If the Superintendent's office Does Approve this Attorney call then the Phone is Brought to my cell at whatever time the office chooses. And If my Attorney isn't in the office or I cannot get through then I have to repeat the process of writing the Superintendent's office to request another call, and wait another week again for a reply (if I receive one at all.)

11. For the above stated reasons, This court should Grant our motion for T.R.O and Preliminary injunction

Signed under the Pains and Penalties
of Perjury.

Dated: 6/23/05

Affiant:

Samuel Correa

Samuel Correa

MC I - Cedar - Junction

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